
San Diego Regional Water Quality Control Board

August 30, 2018

Sent By Email Only

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In reply refer to / attn:
257702:bneill

Subject: Comments on the Draft Environmental Impact Report for the San Onofre Nuclear Generating Station (SONGS) Units 2 & 3 Decommissioning Project, State Clearing House No. 2016071025

Ms. Herzog:

The California Regional Water Quality Control Board, San Diego Region (San Diego Water board) has reviewed the Draft Environmental Impact Report (Draft EIR) dated June 2018 for the *San Onofre Nuclear Generating Station (SONGS) Units 2 & 3 Decommissioning Project*, State Clearing House No. 2016071025 (Project). The Project, a component of the overall SONGS Decommissioning Plan, includes 1) the decontamination and dismantlement (D&D) of onshore above grade structures and other site components, in accordance with United States Nuclear Regulatory Commission (NRC) requirements; 2) partial removal of intake and discharge conduit components for Units 2 and 3 and modification of the Unit 2 discharge conduit for future use if needed; and 3) removal of navigational and environmental monitoring buoys and anchors. The Draft EIR evaluates potential significant environmental impacts of the Project, evaluates alternatives to the Project, and indicates how those significant effects can be mitigated or avoided.

The San Diego Water Board offers the following comments on sections 1, 2, 3, 4.1, 4.4, 4.7, 4.8, 4.9, 5, 6, 7, and 8 of the Draft EIR. The San Diego Water Board did not review the remaining sections and appendices.

1. The Project proposes that the existing intake and discharge conduits for Units 2 and 3 be abandoned in place, while removing select vertical components of the conduits, except for the Unit 2 discharge conduit, which will remain operational. Final disposition of the Unit 2 discharge conduit would occur following completion of future decommissioning activities, such as dewatering and off-site storage of spent nuclear fuel in a permanent or interim repository. The Project should conduct further evaluation of alternatives that eliminate waste streams that require the Unit 2 discharge conduit to remain in place for all future decommissioning activities. As such, the San Diego Water Board encourages decommissioning of the Unit 2 conduit as soon as feasible.
2. The Draft EIR should be revised to identify any potential changes in the characteristics and dynamics of the discharge plume resulting from the Project. Order No. R9-2015-0073, *Waste Discharge Requirements for Southern California Edison Company, San Onofre Nuclear Generating Station, San Diego County Discharge to the Pacific Ocean* (NPDES Permit) currently regulates the discharge of wastewater from SONGS based on the dynamics of a neutrally buoyant discharge plume. Because of the Project, the

discharge characteristics may change causing the discharge plume to become positively buoyant. If that is the case, SCE may need to modify the diffuser design to promote complete mixing and dilution of the wastewater in the Pacific Ocean.

3. The Project proposes to remove 12 of 126 diffuser ports, all primary and auxiliary offshore intake structures, all manhole access port structures, and the fish return terminus. The Project proposes to abandon the intake, discharge, and fish return conduits in place. The Project proposes to consider removing the remaining vertical diffuser structures at a future time. The Draft EIR should be revised to evaluate and explain why the remaining vertical diffuser structures are not removed as part of the Project. The San Diego Water Board supports removing all the diffuser structures that would not be needed for any future decommissioning activities at the site, including removing all the diffuser structures associated with Unit 3. In addition, the Draft EIR should be revised to assess the feasibility of repurposing select vertical offshore structures as artificial reefs for fish, kelp, and other marine life habitat.
4. The San Diego Water Board agrees with the Draft EIR assessment that the Project will require coverage under the Statewide Construction General Storm Water Permit, Order 2009-0009-DWQ. As described in section B.1 of the Construction General Storm Water Permit, demolition activity that results in a land disturbance equal to or greater than one acre is subject to permit coverage.
5. The San Diego Water Board agrees with the Draft EIR assessment that the Project will require a Clean Water Act (CWA) section 401 Water Quality Certification for dredge and fill discharges to waters of the United States. Appendix A of the Draft EIR states that 401 certifications are required for United States Army Corps of Engineers (ACOE) projects. Please note that 401 certifications are not limited to only ACOE projects but are required for any project proponent proposing to discharge dredged and fill material to waters of the United States that also requires a CWA section 404 permit.
6. On page 4.1-39, the draft EIR states that the NRC operating license requires Southern California Edison (SCE) to implement detailed plans and procedures to ensure that radiological releases, due to increases of residual radioactivity concentrations in soil or groundwater, are minimized or avoided; however, these plans and procedures cannot be completed until later in the process. The draft EIR should be revised to explain why these plans and procedures cannot be completed now. The draft EIR should be revised to provide a schedule for when these plans and procedures will be completed. The draft EIR should be revised to explicitly require that such plans and procedures be in place prior to any activities that have the potential to increase the risk of a radiological release to or from the soil or groundwater.
7. The draft EIR evaluates the risks of exposure from radioactive groundwater contamination to workers, the public, or the environment and states that the groundwater beneath SONGS is not a source of drinking water therefore is not regulated. The coastline of the Project site includes a popular public beach for water contact recreational activities that can involve exposure and incidental ingestion of seawater. To alleviate any potential pathways for pollutants that could create a condition of pollution or nuisance in waters of the United States and/or State, the draft EIR should explain why the migration and resurfacing of radioactive groundwater contamination at the Pacific Ocean surf zone is not a risk to water quality, human health, or marine aquatic life.
8. The Project proposes to remove select vertical offshore structures while abandoning the intake and discharge conduits in place. After the vertical offshore structures are

removed, the openings to the conduits will be covered with marine mammal exclusion devices that would allow sand to naturally flow in and fill the interior of the conduits at these openings. This proposed action could potentially block the natural migration of sand, impact benthic organisms and habitats, and entrap marine life inside the abandoned conduits. The draft EIR should be revised to evaluate permanently capping and burying these openings as opposed to leaving them open. In addition, the draft EIR should be revised to address the potential impacts from leaving these conduits open. Capping in place and covering with natural materials that simulate natural conditions could possibly result in a self-mitigating alternative.

9. The draft EIR at section 2.2.3.8 states that water from the D&D of the radiological building will be processed on-site and discharged in accordance with SONGS NPDES permit. The current NPDES permit does not regulate the discharge of wastewater from all D&D activities. SCE will need to submit a request to amend the current NPDES permit (Order No. R9-2015-0073) for regulatory coverage of wastewater discharges from D&D activities not currently regulated. Alternatively, the Project can schedule such wastewater discharges after the discharges are addressed at the time of NPDES Permit reissuance.
10. The draft EIR describes several activities in multiple sections that potentially could create excessive shaking and acoustic vibrations. Such activities may include but are not limited to scabbling, shaving, grinding, needle scaling, jack hammers, heavy equipment moving, excavation activities, and hydraulic hammering. In consideration of the very close proximity of the Independent Spent Fuel Storage Installation (ISFSI) to the Project, the draft EIR should evaluate the risk of activities creating excessive shaking and vibrations that could inadvertently create material wear and failure of the ISFSI components, including but not limited to the storage casks, the interior multi-purpose canisters, the honeycomb framework, fuel assemblies, and the shims. The Project should provide reasonable assurance that the public and the environment is adequately protected from potential failures of the ISFSI caused by decommissioning activities that could cause or create pollution or nuisance conditions in waters of the State.
11. Section 2.3.3.2 of the draft EIR states that to prepare for sectioning the reactor vessel, the reactor refueling cavities would be filled with about 1 million gallons of water. The draft EIR should be revised to include a description of alternatives to using water for this activity and why such alternatives are infeasible. By eliminating using water for this purpose, the Project can reduce the discharge and risk of causing a condition of pollution or nuisance in waters of the State. In addition, the draft EIR should be revised to include a complete description of the treatment process and discharge of this water from the reactor refueling cavities. The Project should maximize conservation of water resources in attaining decommissioning goals and objectives by reducing water consumption where possible and reusing water, following appropriate treatment, such as for dust control and fire suppression.
12. Section 2.3.6 of the draft EIR at page 2-48 states that debris from removing offshore structures will be tested to verify that the debris is free of radiological contamination. If detectable levels are identified, the debris will be disposed of at a facility licensed for that waste. If radiological contamination is identified in the removed offshore structures, then the conduits and other structures abandoned in place could also be at risk of radiological contamination. The draft EIR should address the potential radioactivity of offshore structures that are abandoned in place if the debris from the removed offshore structures was found to have radiological contamination.

13. The site subsurface drainage system currently discharges to the onshore intake structure. Section 2.3.7 of the draft EIR at page 2-50 states that the Project will modify the subsurface drainage system to reroute flow to the beach. The draft EIR should be revised to address measures SCE will employ to prevent stormwater and non-stormwater flows from contacting radiologically contaminated material prior to entering the subsurface drainage system. Also, the draft EIR should be revised to identify measures that will prevent potential radiologically contaminated groundwater from infiltrating into the subsurface drainage system.
14. Section 2.3.7 of the draft EIR at page 2-52 states that the onsite sewage wastewater treatment plant will be terminated and removed when no longer required. The San Diego Water Board supports this action because removing the onsite sewage wastewater treatment plant will eliminate the associated point source discharge of pollutants to the Pacific Ocean.
15. Section 4.9.1.2 of the draft EIR states that new discharges would include treated water from the spent fuel pools, and water used for the reactor vessel segmentation. To the extent possible, the San Diego Water Board encourages SCE to identify feasible alternatives to discharging these waste streams to the Pacific Ocean.

For questions or concerns, please contact Ben Neill with the San Diego Water Board at (619) 521-3376, Ben.Neill@waterboards.ca.gov. In the subject line of any response, please include the reference "257702:bnell".

Respectfully,



David Gibson
Executive Officer

DWG:jgs:dtb:bno:bin

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